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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No. CR 05-00362 WHA
)	
Plaintiff,)	[PROPOSED] ORDER AND STIPULATION
)	EXCLUDING TIME FROM JULY 5, 2005
v.)	TO JULY 26, 2005 FROM THE SPEEDY
)	TRIAL ACT CALCULATION
JUAN VEGA-RAMOS,)	(18 U.S.C. § 3161(h)(8)(A))
)	
Defendant.)	

The parties appeared before the Court on July 5, 2005. With the agreement of the parties, and with the consent of the defendant, the Court enters this order scheduling a motions hearing date of September 6, 2005, at 2:00 p.m., before the Honorable William H. Alsup, and documenting the exclusion of time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(8)(A), from July 5, 2005 to July 26, 2005, the motions filing deadline. The parties agreed, and the Court found and held, as follows:

1. The defendant agreed to an exclusion of time under the Speedy Trial Act. Failure to grant the requested continuance would unreasonably deny both government and defense counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

STIPULATION AND ORDER
 CR 05-00362 WHA

1 2. Given these circumstances, the Court found that the ends of justice served by excluding
2 the period from July 5, 2005 to July 26, 2005, outweigh the best interest of the public and the
3 defendant in a speedy trial. Id. § 3161(h)(8)(A).

4 3. Accordingly, and with the consent of the defendant, the Court ordered that the period from
5 July 5, 2005 to July 26, 2005, be excluded from Speedy Trial Act calculations under 18 U.S.C. §
6 3161(h)(8)(A) & (B)(iv).

7 4. The Court scheduled a motions hearing date of September 6, 2005, at 2:00 p.m., before
8 the Honorable William H. Alsup.

9 IT IS SO STIPULATED.

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11 DATED: _____

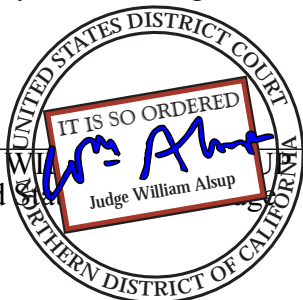
_____/S/
CHRISTINE S. WATSON
Special Assistant United States Attorney

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14 DATED: _____

_____/S/
JOSH COHEN
Attorney for Juan Vega-Ramos

15 IT IS SO ORDERED.

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17 DATED: July 12, 2005

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HON. WILLIAM H. ALSUP
United States District Judge


CERTIFICATE OF SERVICE

The undersigned hereby certifies that she is an employee of the Office of the United States Attorney for the Northern District of California and is a person of such age and discretion to be competent to serve papers. The undersigned further certifies that she caused a copy of:

[PROPOSED] ORDER AND STIPULATION EXCLUDING TIME FROM JULY 5, 2005 TO JULY 26, 2005 FROM THE SPEEDY TRIAL ACT CALCULATION (18 U.S.C. § 3161(h)(8)(A))
to be served this date on the party(ies) in this action,

Via Hand Delivery

JOSH COHEN
Assistant Federal Public Defender
450 Golden Gate Avenue, 19th Floor
San Francisco, CA 94102

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: July 11, 2005

/S/
Ponly J. Tu
Legal Assistant (Immigration)
United States Attorney's Office